

Plaintiffs Federal Firearms Licensees of Illinois, Guns Save Life, Gun Owners of America, Gun Owners Foundation, Piasa Armory, Debra Clark, Jasmine Young, and Chris Moore (collectively “FFL Plaintiffs”); Caleb Barnett, Brian Norman, Hood’s Guns & More, Pro Gun and Indoor Range, and National Shooting Sports Foundation, Inc. (collectively “Barnett Plaintiffs”); Dane Harrel, C4 Gun Store, LLC, Marengo Guns, Inc., Illinois State Rifle Association, Firearms Policy Coalition, Inc., and Second Amendment Foundation (collectively “Harrel Plaintiffs”) (FFL Plaintiffs, Barnett Plaintiffs, and Harrel Plaintiffs collectively referred to as “Plaintiffs”), by and through their attorneys, hereby respond to the State Defendants’ Motion to Extend Deadline for Expert Reports as follows:

On May 3, 2024, Defendants Illinois Attorney General Kwame Raoul, Governor JB Pritzker, and State Police Director Brendan F. Kelly filed a motion under Federal Rule of Civil Procedure 6(b)(1)(A), asking this Court to suspend the May 10, 2024, deadline for the parties to exchange written expert reports until sometime after the close of fact discovery. Plaintiffs take no position regarding Defendants’ request.¹ Plaintiffs will be prepared to comply with the Court’s May 10, 2024, deadline. However, so as not to unfairly prejudice Plaintiffs, should the Court grant Defendants any extension of time to exchange expert reports, Plaintiffs respectfully request a commensurate extension.

Dated: May 6, 2024

Respectfully submitted,

Mark L. Shaw, Esq.
Jennifer Craigmile Neubauer, Esq.
Michael A. Danforth, Esq.
SHAW LAW LTD.

s/ Sean A. Brady
Sean A. Brady, Esq. (pro hac vice)
C.D. Michel, Esq. (pro hac vice)
Konstadinos T. Moros, Esq. (pro hac vice)
MICHEL & ASSOCIATES, P.C.

¹ Plaintiffs note that they do not agree with various of the State’s representations about the status of Plaintiffs’ discovery responses. Those disagreements, however, do not change Plaintiffs’ position on the State’s request.

33 North County Street, Suite 300
Waukegan, Illinois 60085
(T): (847) 244-4696
(F): (847) 244-4673
(E-1): mlshaw@shawlawltd.com
(E-2): jcneubauer@shawlawltd.com
(E-3): michael@danforthlawgroup.comv

180 East Ocean Blvd., Suite 200
Long Beach, CA 90802
(T): (562) 216-4444
(F): (562) 216-4445
(E-1): sbrady@michellawyers.com
(E-2): cmichel@michellawyers.com
(E-3): kmoros@michellawyers.com

*Attorneys for Plaintiffs Federal Firearms
Licensees of Illinois, Guns Save Life, Gun
Owners of America, Gun Owners
Foundation, Piasa Armory, Debra Clark,
Jasmine Young, and Chris Moore*

Dated: May 6, 2024

s/ Matthew D. Rowen (with permission)

Paul D. Clement*
Erin E. Murphy*
Matthew D. Rowen*
CLEMENT & MURPHY, PLLC
706 Duke Street
Alexandria, VA 22314
(202) 742-8900

Gary C. Pinter
SWANSON, MARTIN & BELL, LLP
103 W. Vandalia Street
Suite 215
Edwardsville, IL 62025
(618) 655-3131
gpinter@smbtrials.com

Andrew A. Lothson*
SWANSON, MARTIN & BELL, LLP
330 N. Wabash
Suite 3300
Chicago, IL 60611

**pro hac vice*

*Attorneys for Plaintiffs Caleb Barnett, Brian
Norman, Hood's Guns & More, Pro Gun
and Indoor Range, and National Shooting
Sports Foundation, Inc.*

Dated: May 6, 2024

s/ David G. Sigale (with permission)

David G. Sigale (Atty. ID # 6238103)
LAW FIRM OF DAVID G. SIGALE, P.C.
55 West 22nd Street, Suite 230
Lombard, IL 60148
630.452.4547
dsigale@sigalelaw.com

*Attorneys for Plaintiffs Dane Harrel, C4
Gun Store, LLC, Marengo Guns, Inc.,
Illinois State Rifle Association, Firearms
Policy Coalition, Inc., and Second
Amendment Foundation*

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2024, an electronic PDF of **PLAINTIFFS' OPPOSITION TO STATE DEFENDANTS' MOTION TO EXTEND DEADLINE FOR EXPERT REPORTS** was sent by electronic mail to the following registered attorneys participating in the case:

Counsel for State Defendants Attorney General Kwame Raoul, Governor J.B. Pritzker, and ISP Director Brendan Kelly

Christopher G. Wells
christopher.wells@ilag.gov
Darren Kinkead
darren.kinkead@ilag.gov
Kathryn Muse
kathryn.muse@ilag.gov
Laura K. Bautista
laura.bautista@ilag.gov
Stefanie Krajewski
stefanie.krajewski@ilag.gov
Office of the Attorney General
115 S. LaSalle St.
Chicago, IL 60603

Counsel for Barnett Plaintiffs

Paul D. Clement
paul.clement@clementmurphy.com
Erin E. Murphy
erin.murphy@clementmurphy.com
Matthew D. Rowen
matthew.rowen@clementmurphy.com
Nicholas M. Gallagher
nicholas.gallagher@clementmurphy.com
Clement & Murphy, PLLC
706 Duke Street
Alexandria, VA 22314

Gary C. Pinter
gpinter@smbtrials.com
Swanson, Martin & Bell, LLP
103 W. Vandalia Street, Suite 215
Edwardsville, IL 62025

Andrew A. Lothson
alothson@smbtrials.com
James Vogts
jvogts@smbtrials.com
Swanson, Martin & Bell, LLP
330 N. Wabash, Suite 3300
Chicago, IL 60611

Counsel for Harrel Plaintiffs

David G. Sigale
dsigale@sigalelaw.com
Law Firm of David G. Sigale, P.C.
55 West 22nd Street, Suite 230
Lombard, IL 60148

David H. Thompson
dthompson@cooperkirk.com
Peter A. Patterson
ppatterson@cooperkirk.com
William V. Bergstrom
wbergstrom@cooperkirk.com
Cooper & Kirk
1523 New Hampshire Avenue, NW
Washington, D.C. 20036

Counsel for Langley Plaintiffs

Thomas G. Maag
tmaag@maaglaw.com
Peter J. Maag
lawmaag@gmail.com
Maag Law Firm, LLC
22 West Lorena Avenue
Wood River, IL 62095

Counsel for Defendant Cole Shaner, in his official capacity as State's Attorney for Crawford County, Illinois

Keith B. Hill
khill@heyloyster.com
edwecf@heyloyster.com
HEYL, ROYSTER, VOELKER & ALLEN, P.C.
105 West Vandalia, Suite 100, Mark Twain Plaza III
Edwardsville, IL 62025 0467

Counsel for Randolph County Defendants

James E. Godfrey, Jr.
jgodfrey@evans-dixon.com
Kerry B. Banahan
kbanahan@evans-dixon.com
Katherine F. Asfour
kasfour@evans-dixon.com
211 N. Broadway, Suite 2500
St. Louis, Missouri 63102

Counsel for Defendants, James Gomric, in his official capacity as State's Attorney of St. Clair County, Illinois and Richard Watson, in his official capacity as Sheriff of St. Clair County, Illinois

Thomas R. Ysursa
try@bhylaw.com
BECKER, HOERNER, & YSURSA, P.C.
5111 West Main Street
Belleville, IL 62226

Dated: May 6, 2024

s/ Laura Palmerin
Laura Palmerin